

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

IN RE:)
)
CUMMINGS MANOOKIAN, PLLC,) **Case No. 3:19-bk-07235**
Debtor.) **Chapter 7**
) **Judge Walker**
JEANNE ANN BURTON, TRUSTEE,)
Plaintiff,)
)
v.)
)
HAGH LAW, PLLC; AFSOON)
HAGH; MANOOKIAN, PLLC; and)
FIRST-CITIZENS BANK & TRUST)
COMPANY,)
Defendants.)
) **Adv. Proc. No. 3:20-ap-90002**

NOTICE OF DEPOSITION OF AFSOON HAGH AND HAGH LAW, PLLC

Pursuant to Federal Rules of Bankruptcy Procedure 7026 and 7030 Jeanne Ann Burton, Chapter 7 Trustee and Plaintiff in this action, respectfully gives notice that she will take the deposition of Afsoon Hagh, individually and as the corporate representative of Hagh Law, PLLC, on May 9, 2022¹, beginning at 10:00 a.m. Central time in Courtroom Two, 701 Broadway, Nashville, Tennessee 37203, pursuant to the terms of the Court's Order dated March 28, 2022. The deposition will be recorded by stenographic and/or

¹ The Defendants previously asked to switch the dates of the Afsoon Hagh and Brian Manookian depositions, such that Ms. Hagh would be deposed on May 9 and Mr. Manookian on May 10. The Trustee agreed. Subsequently, on April 20, 2022, the Defendants asked again to reschedule Ms. Hagh's deposition. The Trustee provided alternate dates to the Defendants that would be acceptable to the Trustee for Ms. Hagh's deposition, subject to Court approval. The Defendants have not selected an alternate date; therefore, the Trustee currently intends to depose Ms. Hagh on May 9, 2022, absent an amended notice and/or entry of an agreed order by the Court.

videographic means. The topics to be addressed in the deposition are any nonprivileged matters relevant to any party's claims or defenses, pursuant to Rule 26(b)(1) of the Federal Rules of Civil Procedure made applicable to this matter by Rule 7026 of the Federal Rules of Bankruptcy Procedure. The Trustee anticipates addressing the following topics:

Afsoon Hagh, individually:

- Background of Ms. Hagh's law practice
- Ms. Hagh's relationship with the Debtor
- Ms. Hagh's knowledge of the operations of the Debtor
- Work performed by Ms. Hagh and/or any other attorneys on the *Fitzgerald* case
- The settlement of the *Fitzgerald* case and distribution of settlement proceeds
- Work performed by Ms. Hagh and/or any other attorneys on the *Shoemaker* case
- Expenses advanced by and/or reimbursed to Ms. Hagh in the *Shoemaker* case
- Work performed by Ms. Hagh on any other case listed in Paragraph 23 of the Complaint in this matter

Afsoon Hagh, as representative of Hagh Law, PLLC:

- The founding and operations of Hagh Law, PLLC
- Work performed by Hagh Law, PLLC and/or any other attorneys on the *Fitzgerald* case
- The settlement of the *Fitzgerald* case and distribution of settlement proceeds
- Work performed by Hagh Law, PLLC and/or any other attorneys on the *Shoemaker* case
- Expenses advanced by and/or reimbursed to Hagh Law, PLLC in the *Shoemaker* case

- Work performed by Hagh Law, PLLC on any other case listed in Paragraph 23 of the Complaint in this matter

Dated: April 25, 2022

Respectfully Submitted,

/s/ Phillip G. Young, Jr.

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Special Counsel for Jeanne Ann Burton,
Trustee

Certificate of Service

The undersigned hereby certifies that a true and exact copy of the foregoing has been served via electronic notice/ECF on all parties having made an appearance herein.

This 25th day of March, 2022.

/s/ Phillip G. Young, Jr.

Phillip G. Young, Jr.